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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

No. CR 05-60008 HO

Plaintiff,

v.

**JOINT REPORT ON
DEFENDANT'S MOTION TO
UNSEAL SEALED UNCLASSIFIED
VERSIONS OF TRANSCRIPTS
AND DOCUMENTS**

PIROUZ SEDAGHATY, et al.,

Defendant

On September 30, 2011, the defense met with AUSA Charles Gorder to discuss Defendant's Motion to Unseal Sealed Unclassified Versions of Transcripts and Documents. CR 581.

Listed below are the documents defense counsel is requesting be unsealed and the government's comments:

CR 199 July 13, 2009 hearing, page 48

The government does not object to this page being unsealed.

CR 490,
CR 492 Defense declarations concerning government closing argument

The government objects to these declarations being unsealed.

CR 508 Declaration of Colleen Anderson concerning government closing argument

The government objects to this declaration being unsealed.

CR 481 Pursuant to the Court's order of September 29, 2010, (CR 481) the Court Security Officer has provided a redacted set of transcripts of several of the Court's in camera proceedings during trial. The defense requests these transcripts be filed on the public record.

The government does not object to filing these redacted transcripts on the public record.

CR 454 Day one of trial, September 11, 2010.

The government does not object to a redacted version being filed publicly. The government and defense propose that the redaction should replace the juror names with juror initials in order to preserve the ability to accurately raise any legal issues with the Ninth Circuit.

CR 465 Unredacted jury verdict.

The defense agrees that if the only words redacted from the verdict form is the foreman's name, the redacted version is acceptable and the unredacted version does not need to be made public. If anything else is redacted, this issue will need to be revisited.

CR 473 Unredacted day eight of trial, September 9, 2011 (CR 472 orders a redacted version of the transcript be filed on the docket)

The government does not object to a redacted version being filed publicly. The government and defense propose that the redaction should replace the juror names with juror initials in order to preserve the ability to accurately raise any legal issues with the Ninth Circuit.

Respectfully submitted this 4th day of October, 2011.

/s/ Steven T. Wax

Steven T. Wax
Federal Public Defender

/s/ Lawrence H. Matasar

Lawrence H. Matasar